

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

R2 Solutions LLC,
Plaintiff,

v.

Databricks, Inc.,
Defendant.

Civil Action No. 4:23-cv-01147-ALM

**DECLARATION OF CARDER W. BROOKS IN SUPPORT OF PLAINTIFF'S
RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION TO
TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

1. My name is Carder Brooks. I am over 18 years of age, of sound mind, and fully qualified and competent in all respects to make this declaration. The facts set forth in this declaration are based upon my personal knowledge and are true and correct.

2. I am an attorney with the firm Nelson Bumgardner Conroy PC, which represents Plaintiff R2 Solutions LLC, in the above-captioned case. This declaration is submitted to support Plaintiff's Response in Opposition to Defendant's Motion to Transfer Venue pursuant to 28 U.S.C. § 1404(a).

3. Attached hereto as Exhibit 1 is a true and correct copy of a Court Comparison Report: EDTX vs. NDCA, Docket Navigator, accessed from and available at https://search.docketnavigator.com/patent/court_comparison/0/0 (last accessed June 6, 2024).

4. Attached hereto as Exhibit 2 is a true and correct excerpt of the December 31, 2023 Report for the Federal Court Management Statistics, downloaded from and available at

https://www.uscourts.gov/sites/default/files/fcms_na_distprofile1231.2023_0.pdf (last accessed June 6, 2024).

5. Attached hereto as Exhibit 3 is a true and correct copy of the Certificate of Formation Limited Liability Company for R2 Solutions, LLC filed in the Office of the Secretary of State of Texas.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Membership Interest Purchase Agreement executed on April 25, 2020.

7. Attached hereto as Exhibit 5 is a true and correct copy of the results of a search for “R2 Solutions LLC” conducted on June 6, 2024, using the “Taxable Entity Search” engine at <https://mycpa.cpa.state.tx.us/coa/> maintained by the Office of the Comptroller of Public Accounts of the State of Texas.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Certificate of Fact certified by the Secretary of State of Texas that the Certificate of Formation for R2 Solutions LLC was filed in the Office of the Secretary of State on May 16, 2016.

9. Attached hereto as Exhibit 7 is a true and correct copy of a LinkedIn search for Databricks employees in Texas, accessed from and available at https://www.linkedin.com/search/results/people/?currentCompany=%5B%223477522%22%5D&geoUrn=%5B%22102748797%22%5D&origin=FACETED_SEARCH&sid=tj%2C (last accessed June 5, 2024).

10. Attached hereto as Exhibit 8 is a true and correct copy of a LinkedIn search for Databricks employees in the Dallas-Fort Worth metroplex, accessed from and available at <https://www.linkedin.com/search/results/people/?currentCompany=%5B%223477522%22%5D>

&geoUrn=%5B%2290000031%22%5D&origin=FACETED_SEARCH&sid=po~ (last accessed June 6, 2024).

11. Attached hereto as Exhibit 9 is a true and correct copy of a LinkedIn search for Databricks employees in Plano, Texas, accessed from and available at https://www.linkedin.com/search/results/people/?currentCompany=%5B%223477522%22%5D&geoUrn=%5B%22100517351%22%5D&origin=FACETED_SEARCH&sid=8-h (last accessed June 5, 2024).

12. Attached hereto as Exhibit 10 is a true and correct copy of a Databricks webpage accessed from and available at <https://www.databricks.com/company/contact/office-locations> (last accessed June 6, 2024).

13. Attached hereto as Exhibit 11 is a true and correct copy of the LinkedIn profile for Giri R. Varatharajan, accessed from and available at <https://www.linkedin.com/in/girivaratharajan/> (last accessed June 5, 2024).

14. Attached hereto as Exhibit 12 is a true and correct copy of the LinkedIn profile for Amit Kumar Jha, accessed from and available at <https://www.linkedin.com/in/akj/> (last accessed June 5, 2024).

15. Attached hereto as Exhibit 13 is a true and correct copy of the LinkedIn profile for Archana Krishnamurthy, accessed from and available at <https://www.linkedin.com/in/archana-krishnamurthy-073b7786/> (last accessed June 5, 2024).

16. Attached hereto as Exhibit 14 is a true and correct copy of the LinkedIn profile for Birbal Das, accessed from and available at <https://www.linkedin.com/in/birbal-das-a6a367195/> (last accessed June 5, 2024).

17. Attached hereto as Exhibit 15 is a true and correct copy of the LinkedIn profile for Cody Austin Davis, accessed from and available at <https://www.linkedin.com/in/codydavis55/> (last accessed June 5, 2024).

18. Attached hereto as Exhibit 16 is a true and correct copy of the LinkedIn profile for Hari Ganesan, accessed from and available at <https://www.linkedin.com/in/hariharanganesan/> (last accessed June 5, 2024).

19. Attached hereto as Exhibit 17 is a true and correct copy of the LinkedIn profile for Hayley Horn, accessed from and available at <https://www.linkedin.com/in/hayleyhorn/> (last accessed June 5, 2024).

20. Attached hereto as Exhibit 18 is a true and correct copy of the LinkedIn profile for Howard W., accessed from and available at <https://www.linkedin.com/in/howard-w-9912818/> (last accessed June 5, 2024).

21. Attached hereto as Exhibit 19 is a true and correct copy of the LinkedIn profile for Joshua Bae, accessed from and available at <https://www.linkedin.com/in/joshua-bae/> (last accessed June 5, 2024).

22. Attached hereto as Exhibit 20 is a true and correct copy of the LinkedIn profile for Jun Yang, accessed from and available at <https://www.linkedin.com/in/junyangdev/> (last accessed June 5, 2024).

23. Attached hereto as Exhibit 21 is a true and correct copy of the LinkedIn profile for Mathan Pillai, accessed from and available at <https://www.linkedin.com/in/mathan-pillai-3b254961/> (last accessed June 5, 2024).

24. Attached hereto as Exhibit 22 is a true and correct copy of the LinkedIn profile for Phanitha Kommareddi, accessed from and available at <https://www.linkedin.com/in/phanitha-kommareddi-3ab563155/> (last accessed June 5, 2024).

25. Attached hereto as Exhibit 23 is a true and correct copy of the LinkedIn profile for Scott Love, accessed from and available at <https://www.linkedin.com/in/lovescott/> (last accessed June 5, 2024).

26. Attached hereto as Exhibit 24 is a true and correct copy of the LinkedIn profile for Shyamprasad Reddy, accessed from and available at <https://www.linkedin.com/in/shyamspr/> (last accessed June 5, 2024).

27. Attached hereto as Exhibit 25 is a true and correct copy of the LinkedIn profile for Srikanth Gupta Anumula, accessed from and available at <https://www.linkedin.com/in/srikanth-gupta-anumula-4a215416/> (last accessed June 5, 2024).

28. Attached hereto as Exhibit 26 is a true and correct copy of the LinkedIn profile for Stephen Hage, accessed from and available at <https://www.linkedin.com/in/stephenhage/> (last accessed June 5, 2024).

29. Attached hereto as Exhibit 27 is a true and correct copy of the LinkedIn profile for Suraj Karuvel, accessed from and available at <https://www.linkedin.com/in/surajkaruvel/> (last accessed June 5, 2024).

30. Attached hereto as Exhibit 28 is a true and correct copy of the LinkedIn profile for Tanveer Shaikh, accessed from and available at <https://www.linkedin.com/in/tanveer-shaikh-12467363/> (last accessed June 5, 2024).

31. Attached hereto as Exhibit 29 is a true and correct copy of the LinkedIn profile for Vasu, accessed from and available at <https://www.linkedin.com/in/sreenids/> (last accessed June 5, 2024).

32. Attached hereto as Exhibit 30 is a true and correct copy of the LinkedIn profile for Yedunathan Ambileriveettil, accessed from and available at <https://www.linkedin.com/in/yedunathan-ambileriveettil-b6706723/> (last accessed June 5, 2024).

33. Below is a table summarizing the LinkedIn profiles of Databricks employees:

Employee	Title	Location	Relevant Knowledge
Giri R. Varatharajan (Ex. 11)	Director, Technical Solutions	DFW Metroplex	Spark, Databricks Platform (leads technical solutions team)
Amit Kumar Jha (Ex. 12)	Solutions Architect, Delivery	DFW Metroplex	Spark, Databricks Platform
Archana Krishnamurthy (Ex. 13)	Delivery Solutions Architect	DFW Metroplex	Spark, Databricks Platform, customer use cases and inducement
Birbal Das (Ex. 14)	Sr. Specialist Solution Architect	DFW Metroplex	Spark, Databricks Platform
Cody Austin Davis (Ex. 15)	Sr. Solutions Architect – Digital Native Business, Strategic Accounts	DFW Metroplex	Spark, Databricks Platform, Lakehouse ecosystem (leads the Data Warehousing SME group)
Hari Ganesan (Ex. 16)	Senior Resident Solutions Architect	Plano, TX	Spark, Databricks Platform, customer use cases and inducement
Hayley Horn	Field Engineering	Plano, TX	Spark, Databricks Platform

(Ex. 17)	Manager		
Howard W. (Ex. 18)	Senior Solutions Architect	Plano, TX	Spark, Databricks Platform, Big Data Analytics (spearheaded Spark/Databricks certification program for those who “wanted deeper technical knowledge on Spark programming”)
Joshua Bae (Ex. 19)	Senior Delivery Solutions Engineer	Plano, TX	Spark, Databricks Platform
Jun Yang (Ex. 20)	Sr. Technical Solutions Engineer	DFW Metroplex	Spark, Databricks Platform
Mathan Pillai (Ex. 21)	BigData Solutions Engineer	Plano, TX	Spark, Databricks Platform (expert in field), customer use cases and inducement
Phanitha Kommareddi (Ex. 22)	Delivery Solutions Architect	Leander, TX	Spark, Databricks Platform, customer use cases and inducement
Scott Love (Ex. 23)	Practice Lead – Resident Solutions Architect	Plano, TX	Spark, Databricks Platform
Shyamprasad Reddy (Ex. 24)	Senior Solutions Engineer	Plano, TX	Spark, Databricks Platform
Srikanth Gupta Anumula (Ex. 25)	Resident Solutions Architect	Plano, TX	Spark, Databricks Platform, Big Data Analytics
Stephen Hage (Ex. 26)	Solutions Architect	DFW Metroplex	Spark, Databricks Platform

Suraj Karuvel (Ex. 27)	Solutions Architect – Field Engineering	DFW Metroplex	Spark, Databricks Platform
Tanveer Shaikh (Ex. 28)	Sr. Manager, Field Engineering	DFW Metroplex	Spark, Databricks Platform
Vasu (Ex. 29)	Sr. Python Developer	Plano, TX; San Francisco, CA	Spark, Databricks Platform, MapReduce
Yedunathan Ambileriveettil (Ex. 30)	Delivery Solutions Architect	Plano, TX	Spark, Databricks Platform, Data Science

34. Substantially all, if not all, of R2 Solutions LLC's documents are stored on servers at our offices located in Fort Worth, Texas. Such documents include information relevant to patent prosecution, ownership, infringement, damages (such as license agreements involving the asserted patents), and validity (including various asserted prior art). To the best of my knowledge, no physical copies of these documents are located in California.

I declare under penalty of perjury that the statements made in this Declaration are true and correct.

Dated: June 10, 2024


Carder W. Brooks